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Attorney for Plaintiff The Hilb Group of New York, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**THE HILB GROUP OF NEW
YORK, LLC,**

Plaintiff,

v.

ASSOCIATED AGENCIES, INC.,
and

GREGORY RING,

DEFENDANTS.

CASE NO. 1:23-mc-264

Underlying litigation:
Civil Action No. 2:22-cv-04131-JMA-ST,
United States District Court for the Eastern
District of New York

**THE HILB GROUP OF NEW YORK, LLC'S NOTICE OF MOTION
TO COMPEL COMPLIANCE WITH SUBPOENAS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated August 8, 2023, the Declaration of Katherine Lennox dated August 7, 2023, and the exhibits annexed thereto, and upon all prior pleadings and proceedings in the underlying litigation pending in the United States District Court for the Eastern District of New York, captioned *The Hilb Group of New York, LLC v. Associated Agencies, Inc., et al.*, Civil Case No. 2:22-cv-04131-JMA-ST

(“Underlying Litigation”), The Hilb Group of New York, LLC (“Hilb”), by and through its undersigned counsel, shall respectfully move this Court at the United States Courthouse for the Southern District of New York , at the location, date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i) compelling non-parties Jordan Perlmutter, Jodi Perlmutter, and Pivot Media Ventures, LLC to comply with the subpoenas served upon them by Hilb in the Underlying Litigation, and for all such other, further or different relief which the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), answering papers, if any, shall be served within fourteen (14) days after service of the moving papers, and reply papers, if any, shall be served within seven (7) days after service of the answering papers.

Dated: New York, New York
August 8, 2023

Respectfully submitted,

McGUIREWOODS LLP

By: /s/ Adam T. Simons
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*Attorneys for Plaintiff The Hilb Group of
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of August, 2023, I caused a true and correct copy of the foregoing Notice of Motion to Compel Compliance with Subpoenas to be duly served upon all parties and non-parties to this action, as indicated below, via electronic mail and Federal Express overnight mail, postage prepaid:

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*Attorneys for Non-Parties Jordan Perlmutter,
Jodi Perlmutter, and Pivot Media Ventures, LLC*

Dated: New York, New York
August 8, 2023

/s/ Adam T. Simons
Adam T. Simons

*Counsel for Plaintiff The Hilb Group of New
York, LLC*